UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Gulfport Energy Corporation
14313 N. May Ave. Suite 100
Oklahoma City, OK 73134

ATTENTION:

Jeff Seal
Environmental Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Gulfport Energy Corporation (Gulfport or you) to submit certain information about facilities in Belmont, Harrison, and Monroe Counties, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 45 calendar days after you receive this request, unless an alternative time frame is specified for an individual item.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Gulfport owns and operates emission sources at its facilities in Belmont, Harrison, and Monroe Counties, Ohio. We are requesting this information to determine whether your emission sources are complying with the Ohio State Implementation Plan and the Standards of

Performance for Crude Oil and Natural Gas Production, Transmission and Distribution, at 40 C.F.R. Part 60 Subpart OOOO.

Gulfport must send all required information to:

> Attn: Compliance Tracker, AE-17J
> Air Enforcement and Compliance Assurance Branch
> U.S. Environmental Protection Agency
> Region 5
> 77 W. Jackson Boulevard
> Chicago, Illinois 60604

Gulfport must submit all required information under an authorized signature with the following certification:

> I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject Gulfport to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Natalie Topinka at 312-886-3853 or topinka.natalie@epa.gov.

7/26/16
Date

Edward Nam
Acting Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.

2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.

3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.

4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.

5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.

6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.

2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.

4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).

5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.

6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or the Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution, at 40 C.F.R. Part 60 Subpart OOOO.

Document or *documents* means any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.

Relate to (or any form thereof) means constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Control Device or its plural means the air pollution control equipment used to achieve VOC emission reductions, for example, enclosed flare, combustor, combustion device, vapor recovery unit, etc.

Enclosed Combustor means a thermal oxidation system with an enclosed combustion chamber that maintains a limited constant temperature by controlling fuel and combustion air.

Flash Emissions means entrained natural gas vapors or other emissions that are released from hydrocarbon liquids when exposed to temperature increases or pressure drops, for example such as when Produced Oil is transferred from production vessels to other vessels or to atmospheric storage tanks.

Oil means hydrocarbon liquids.

Oil and Natural Gas Production Facility means all of the air pollution emitting units and activities located on or integrally connected to one or more Oil and Natural Gas Wells that are used for production operations and storage operations.

Oil and Natural Gas Well means a single well that extracts subsurface reservoir fluids containing a mixture of Oil, natural gas, and water.

Owner or Operator means any Person who owns, leases, operates, controls, or supervises an Oil and Natural Gas Production Facility.

Person or its plural or any synonym thereof, is intended to and shall embrace and include any individual, partnership, corporation, company, association, government agency (whether federal, state, local or any agency of the government of a foreign country) or any other entity.

Pressure Vessel means a storage vessel that is used to store liquids or gases and is designed not to vent to the atmosphere as a result of compression of the vapor headspace in the Pressure Vessel during filling of the Pressure Vessel to its design capacity.

Produced Natural Gas means natural gas that is separated from extracted reservoir fluids during production operations.

Produced Oil means Oil that is separated from extracted reservoir fluids during production operations.

Produced Oil Storage Tank means a unit that is constructed primarily of non-earthen materials (such as steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of Produced Oil.

Produced Water means water that is separated from extracted reservoir fluids during production operations.

Produced Water Storage Tank means a unit that is constructed primarily of non-earthen materials (such as steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of Produced Water.

Tank Battery means all Produced Oil or Produced Water Storage Tanks, or a combination thereof, that are manifolded together at a well pad. If a Produced Oil or Produced Water Storage Tank is not manifolded together with any other Produced Oil or Produced Water Storage Tanks, then that single tank is a Tank Battery.

Tank Vapor Capture System means a system used to contain and convey vapors to a Control Device from one or more Tank Batteries. A Tank Vapor Capture System includes, for example, one or more Tank Batteries, piping to convey vapors from the Battery/Batteries to a Control Device, fittings, connectors, and liquid knockout vessels.

You and/or *Your* means Gulfport, and all its agents, servants, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, contractors and others who are in possession, custody or control (actual or constructive) of relevant information that is otherwise available to You, or may have obtained information for or on behalf of, Gulfport.

Appendix B

Information You Are Required to Submit to EPA

Using the instructions and definitions set forth in Appendix A, Gulfport must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), within the time period specified in the cover letter of this request and for the specific time frame for Question 5.

1. Column B ("Well Pad Facility Name") of Appendix D includes a list of Oil and Natural Gas Well pads owned and/or operated by Gulfport. For each well pad listed in Column B, provide the following information:

    a. In Column C, identify the wells that send Produced Oil to that well pad (use one row for each well; insert additional rows if needed).
    b. In Column D, identify the corresponding API number for each well.
    c. In Column E, specify how many Tank Batteries are located at the well pad, and indicate for each Tank Battery which well(s) produce into that Tank Battery.
    d. In Column F, specify how many Tank Vapor Capture Systems are used to control Tank Battery emissions at the well pad, and indicate which Tank Batteries are controlled by each Tank Vapor Capture System. If more than one Tank Vapor Capture System exists at the well pad, create a new row for each additional Tank Vapor Capture System in Appendix D to provide subsequent information as to each Tank Vapor Capture System in separate rows.

2. Provide the following information in Columns G through K for each Produced Oil Storage Tank and each Produced Water Storage Tank associated with the well pads listed in Column B:

    a) The potential for VOC Emissions (in tons per year);
    b) Maximum average daily throughput determined for a 30-day period of production prior to the applicable emission determination deadline for that Produced Oil or Produced Water Storage Tank, and the method by which this value was determined (including all design considerations, measured values, calculations, and assumptions;
    c) Specify the model or calculation methodology that was used to calculate potential for VOC emissions based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable determination deadline;
    d) For each model or calculation methodology identified in response to Question 2.c, above, provide an explanation of how that model or calculation methodology was applied, and provide an example calculation of potential for VOC emissions for at least one Produced Oil and at least one Produced Water Storage Tank associated with the well pads listed in Column B; and
    e) Identify all legally and practically enforceable limits established in an operating

permit or other requirement that were taken into account in the determination.

3. Separately, for each Tank Vapor Capture System listed in Column F in Appendix D, affirmatively state in Column L ("Did Gulfport conduct a design analysis of the Tank Vapor Capture System & Control Device prior to or after its construction?") of the workbook whether or not Gulfport conducted, prior to or after construction of the Tank Vapor Capture System and Control Device, a design analysis of the Tank Vapor Capture System and Control Device to determine whether the Tank Vapor Capture System and Control Device are adequately designed to handle the peak flow of vapors associated with the movement of Oil and Produced Water to the Produced Oil and Produced Water Storage Tanks. If your response is yes, please provide the date of that analysis in Column M ("If yes, what was the date the analysis was conducted?") of the workbook. If a design analysis has been conducted, please supply all Documents supporting the design analysis of each Tank Vapor Capture System and Control Device in Column N ("Supply all Documents supporting the design analysis of each Tank Vapor Capture System and Control Device") of the workbook and in accordance with the directions in Row 4 (column headers). If a design analysis was conducted but the Documentation was not retained or never existed, provide a narrative of the following:

    a. Identify the Person(s) responsible for retaining and maintaining any Documents;
    b. The last date(s) on which the Documents were retained and any corporate policy(ies) on Document retention; and
    c. Describe the design analysis conducted, and describe what any Documentation of the design analysis was and what it contained.

4. For each Tank Vapor Capture System listed in Column F of Appendix D, provide responses to the information requested below. Please use Columns O ("Piping & instrumentation diagram of the process (wellhead(s) to Control Device)") through CD ("What is the construction date of the Produced Water and Produced Oil Storage Tank(s) associated with each well site.") and in accordance with the directions provided in Row 4 (column headers) of the Appendix D workbook to provide the following information:

    a. Provide a piping & instrumentation diagram of the process (wellhead(s) to Control Device). If more than one Produced Oil Storage Tank is present within a Tank Vapor Capture System, describe how Produced Oil flows between the storage tanks.

    b. Identify the gas gathering pipeline into which gas enters and the maximum allowable operating pressure (psig) of that pipeline.

    c. Where heater treaters are used, indicate the maximum recycle rate that may occur for each treater. Additionally, provide a narrative description of how the production from the upstream wells is set to flow to the initial Pressure Vessel(s) (e.g. continuous pump, based on time, pressure, other parameter(s) or a

combination of these). State whether more than one well can flow to an initial separator or heater treater concurrent with another well or wells.

d. Provide a description, name and tag # ID of the initial separator or heater treater(s) (e.g. single stage, dual stage, dual coil, HLP, VGR, etc.). For each stage of the initial separator or heater treater(s) provide the following:

    i. The maximum operating pressure (psig) and temperature (°F).
    ii. Describe where any separated gas is routed from the first stage of the initial Pressure Vessel.
    iii. If more than one stage in the initial separator or heater treater(s), provide the maximum operating pressure (psig) and temperature (°F) of the second stage of separation.
    iv. If more than one stage in the initial separator or heater treater(s), describe where Flash Emissions from subsequent stages of initial separator or heater treater(s) are routed.
    v. Whether or not the final separator or heater treater stage features a device on the liquid outlet line to prevent a vortex from forming during a liquid dump event which could lead to unintentional gas carry through. Provide a narrative description of the device.

e. State whether there is, or ever has been, an intermediate separation vessel(s) between the initial Pressure Vessel and the Produced Water and Produced Oil Storage Tank(s). If so, provide:

    i. The maximum operating pressure (psig) and temperature (°F).
    ii. Describe where Flash Emissions from the intermediate separation vessel(s) are routed.
    iii. The date of installation of the intermediate separation vessel(s).
    iv. The date of removal or discontinued use of the intermediate separation vessel(s), if applicable.

f. Provide the interior pipe diameter (inches) from the separation vessel immediately upstream of the Produced Water and Produced Oil Storage Tank(s) for (if the interior pipe diameter is not available, measure the separator or heater treater outlet exterior pipe diameter, and so note):

    i. The Produced Oil outlet pipe.
    ii. The Produced Water outlet pipe.

g. Provide the orifice plate diameter (inches) and make, model, size and trim of the liquid dump valve from the separation vessel immediately upstream of the Produced Water and Produced Oil Storage Tank(s) for:

i. The Produced Oil outlet pipe.
ii. The Produced Water outlet pipe.

h. Describe whether the liquids are trucked or piped (specify batch or continuous) offsite from the Produced Water and Produced Oil Storage Tank(s) from:

i. The Produced Oil tank(s).
ii. The Produced Water tank(s).

i. State whether the control system and dump valve managing the flow of liquids from the Pressure Vessel immediately upstream of the Produced Water and Produced Oil Storage Tank(s) results in continuous or intermittent dumping events.

i. If the type of flow depends on the amount of liquid throughput or other operating parameters, describe the conditions under which each type of flow will occur.

j. If the flow of liquids from the separation vessel(s) immediately upstream of the Produced Water and Produced Oil Storage Tank(s) is in intermittent batches, provide:

i. A narrative description of what triggers a liquid dumping event.
ii. The maximum Produced Oil volume (barrels) of the separation vessel immediately upstream of the Produced Oil Storage Tank(s), and the portion of this volume dispensed during an individual dumping event.
iii. The maximum Produced Water volume (barrels) of the separation vessel immediately upstream of the Produced Water Storage Tank(s), and the portion of this volume dispensed during an individual dumping event.
iv. An estimate of the peak instantaneous Produced Oil flow rate during a dumping event (in gallons per minute). This may be estimated using the following method:
Instantaneous flow rate = average daily production (barrels) / (dumping frequency (dumping events per day) x duration of a dumping event (hours)). The average daily production should be calculated based on well operating hours and Produced Oil production for June 2016.
v. An estimate of the peak instantaneous Produced Water flow rate during a dumping event (in gallons per minute). This may be estimated using the following method:
Instantaneous flow rate = average daily production (barrels) / (dumping frequency (dumping events per day) x duration of a dumping event (hours)). The average daily production should be

calculated based on well operating hours and Produced Water production for June 2016.

k. If the flow of liquids from the separation vessel(s) immediately upstream of the Produced Water and Produced Oil Storage Tank(s) is continuous, provide:

   i. The maximum Produced Oil pump rate from the separation vessel immediately upstream of the Produced Oil Storage Tank.
   ii. The maximum Produced Water pump rate from the separation vessel immediately upstream of the Produced Water Storage Tank.

l. For each Tank Vapor Capture System, provide the number of Produced Water and Produced Oil Storage Tank(s) whose vapors are captured by the Tank Vapor Capture System, and the volume (barrels) of each Tank.

m. Describe the storage Tank Vapor Capture System which routes tank vapors to the on-site Control Device by providing the following:

   i. Pressure relief settings (psi) on both the thief hatch and the pressure relief valve on any Produced Water and Produced Oil Storage Tank(s) or Tank Vapor Capture System. Note any changes in pressure relief settings that may have occurred, include the original and modified settings and date(s) when changed.
   ii. Information on any pressure control valve installed on the Tank Vapor Capture System between the Produced Water and Produced Oil Storage Tank(s) and the end Control Device including make, model, size, and any additional features affecting its flow capacity. Also provide either its Cv and Cf values or its performance curve. List the filenames if provided electronically or an Attachment name identifier if hard copy.
   iii. Thief hatch gasket/seal information, including the type of gasket/seal used (e.g. rubber, Viton). Note any changes in the type of gasket/seal that may have occurred, include the original and modified type and date(s) when changed.
   iv. Pipe length (feet) from the Produced Water and Produced Oil Storage Tank(s) to the Control Device (if the Tank Vapor Capture System collects vapor from multiple tanks, use the average pipe length for all the Produced Water and Produced Oil Storage Tank(s) to the Control Device).
   v. Inner pipe diameter (inches) of the Tank Vapor Capture System from the Produced Water and Produced Oil Storage Tank(s) to the Control Device. Note any changes in inner pipe diameter that may have occurred, include the original and modified diameters and date(s) when changed.
   vi. Number of short radius elbows (short radius elbows have a radius equal to the pipe diameter).
   vii. Number of long radius elbows (long radius elbows have a radius 1.5 times

the pipe diameter).

viii. Number of tees.

ix. Number and type of valves (e.g. gate, check, globe, etc.).

x. If the Control Device is a combustor, provide the rated pressure loss across the combustor burner assembly as provided by the manufacturer of the combustion device (psi).

xi. Describe any low points in the Tank Vapor Capture System piping where liquids could accumulate. Describe the frequency of draining these liquids. Describe the indicator, if any, that notifies the Operator that liquids must be drained or that excessive flow restrictions have developed in the piping

xii. Set-point pressure (ounces per square inch) and maximum flow capacity (scf/hr) at that set-point of any backpressure valves installed on the Tank Vapor Capture System.

xiii. Flame arrestor information including make, model, size and performance curve showing the pressure loss as a function of the flow rate. List the filenames if provided electronically or an Attachment name identifier if hard copy. Indicate the maximum tolerance for arrestor fouling considered in the Tank Vapor Capture System design, and describe the indicator, if any, that notifies the Operator that the arrestor has become fouled and is in need of servicing (especially at sites where waste gas flow to the end Control Device is intermittent).

xiv. Provide a narrative description of the operations and maintenance program Gulfport employs to ensure emissions are minimized from the Produced Water and Produced Oil Storage Tank(s), Tank Vapor Capture System(s), including thief hatch(es) and pressure relief valve(s), and the frequency of such.

n. Identify all types of Control Device used for the period covering the date of first production to present (e.g. open flare, Enclosed Combustor, VRU, etc.) and the control efficiency. Any changes to the type of Control Device used during the relevant time period must be listed with the corresponding date range for each Control Device's use. Include downtime dates and hours for each Control Device since first production. For combustors and/or flares, provide the following:

    i. The manufacturer specifications showing the maximum flow rate of tank vapors under which a control efficiency of at least 95% for volatile organic compounds can be achieved (scf/hr).

    ii. The manufacturer recommended maintenance and service requirements.

    iii. Provide a narrative description of the servicing Gulfport performs on the combustor(s) or flare(s) and the frequency of such.

o. List the construction date of the Produced Water and Produced Oil Storage Tank(s) associated with each well site.

5. Within 60 days of receipt of this request, for each Tank Vapor Capture System (see Column F), provide the following analytical results for at least one well from which Produced Oil and/or Produced Water is routed to a common Produced Water and Produced Oil Storage Tank or group of Produced Water and Produced Oil Storage Tanks manifolded together and controlled with that Tank Vapor Capture System. The analytical results shall be recorded in Columns CE ("Filename of extended hydrocarbon liquid analysis of a pressurized Produced Oil sample from the pressurized vessel immediately upstream of the Produced Oil Storage Tank(s)") through Column CH ("Reid Vapor Pressure of Produced Oil in the Produced Oil Storage Tank(s) [psia]") and in accordance with the directions provided in Row 4 (column headers) of the Appendix D workbook:

    a. An extended hydrocarbon liquid analysis of a pressurized Produced Oil sample and a pressurized Produced Water sample from the pressurized vessel immediately upstream of the Produced Water and Produced Oil Storage Tank(s). Follow the test procedure found in appendix B to the California Air Resource Board's (CARB) Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. The CARB test procedure may be found on page 271 of the Document at the following link:

    http://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2014-unofficial-02042015.pdf

    If such samples and analyses have been done within the past 12 months, You may provide that data in lieu of analyzing new samples. Include a copy of the lab analysis report showing:

    i. The protocol or test procedure used to collect and analyze the samples.
    ii. Date of each sample collection.
    iii. Start and end times for each sample collection and the duration of time that the samples were collected over (minutes).
    iv. Name of Oil and Natural Gas Wells associated with the pressurized vessel sampled.
    v. Description of where, within the Oil and natural gas production process, the sample was collected.
    vi. Operating temperature (°F) and pressure (psi) of the vessel at the time the sample was collected. Include a statement on how these values compare to the maximum temperature and pressure observed during a typical 12-month period, and indicate the maximum expected or observed values.
    vii. The pressure (psi) of the sample at the time it was received by the laboratory.

At least 21 days prior to sampling, please provide a sampling protocol and schedule of sampling locations to Natalie Topinka at EPA Region 5, at topinka.natalie@epa.gov.

b. API Gravity and Reid Vapor Pressure (RVP) (psia) of the Produced Oil in the Produced Oil Storage Tank(s).

6. For each well identified in Column C, provide the throughput (bbl) for Produced Oil and Produced Water, for each month since first production. ("Filename of monthly throughput (bbl) for Produced Oil and Produced Water from each well since date of first production.").

7. For each well pad facility identified in Column B, copies of all applications for Air Permits to Install or Operate submitted to Ohio EPA.

8. Copies of all correspondence with OEPA relating to any of Gulfport's air permit applications for any of the well pad facilities identified in Column B.

9. Any notifications or initial annual reports submitted pursuant to 40 C.F.R § 60.5420 for any of the well pad facilities identified in Column B.

10. All records of inspections conducted pursuant to 40 C.F.R §60.5411 and § 60.5416 for any of the well pad facilities identified in Column B.

11. Copies of all stack tests, emissions tests, or engineering tests for any air pollutant, including but not limited to VOCs, HAP, particulate matter, nitrogen dioxide, and carbon monoxide, conducted at any of the well pad facilities identified in Column B.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

"Emission data" means, with reference to any source of emissions of any substance into the air:

> Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;
>
> Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and
>
> A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

See 40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.

2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?

3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?

4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.

6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.

8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Jeff Seal
Environmental Manager
Gulfport Energy Corporation
14313 N. May Ave. Suite 100
Oklahoma City, OK 73134

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by E-mail to:

Bob Hodanbosi
OEPA
Chief, Division of Air Pollution Control
bob.hodanbosi@epa.ohio.gov

Melisa Witherspoon
OEPA
Southeast District Office
melisa.witherspoon@epa.ohio.gov

On the 27 day of July 2016.

Loretta Shaffer

Loretta Shaffer, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7646 9463